IN THE UNITED STATES BANKRUPTCY COURT WESTERN DISTRICT OF MISSOURI

| IN RE: | |) | |
|----------------|---------|---|-------------------|
| Adam Dold, IV, | |) | Case No. 25-40123 |
| | Debtor. |) | |
| | |) | |

RESPONSE TO TRUSTEE'S MOTION TO DENY CONFIRMATION

COMES NOW, the Debtor, by and through their attorney, and for the response to the Trustee's Motion to Deny Confirmation states as follows:

- 1. Debtor states that the plan length issue is caused by the Tower Loan claim, to which Debtor will likely be objecting.
- 2. Debtor plans to resolve this issue by objecting to the Tower Loan claim, as Debtor does not believe he owns any of the property that has been listed as collateral.

WHEREFORE, Debtor requests this Court dismiss the Trustee's Motion to Deny Confirmation or in the alternative, Debtor requests that this matter be set for hearing.

Respectfully Submitted,

s/ Ryan B. Patton

Ryan B. Patton #57966 Patton & Dean, LLC 8643 Hauser Ct, Ste 235 Lenexa, KS 66215

Phone: (816) 470-9992 Fax: (888) 720-1985 Attorney for the Debtor

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the parties notified by the US Bankruptcy Court's electronic notification system, upon the affected creditors and other parties in interest via US First Class Mail, postage prepaid, this 31st day of March, 2025.

s/ Ryan B. Patton Ryan B. Patton #57966